

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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BOSTON EDISON COMPANY,)	
CAMBRIDGE ELECTRIC LIGHT)	
COMPANY AND COMMONWEALTH)	D.T.E 03-121
ELECTRIC COMPANY)	
each doing business as)	
NSTAR ELECTRIC COMPANY)	
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**KEYSPAN ENERGY DELIVERY NEW ENGLAND
PETITION FOR
LIMITED PARTICIPANT STATUS**

KeySpan Energy Delivery New England¹ (“KeySpan” or the “Company”), pursuant to 220 C.M.R. 1.03, hereby petitions the Department of Telecommunications and Energy (“Department”) for limited participant status in the above-captioned proceeding. In support of this request, KeySpan states the following:

1. The KeySpan companies are Massachusetts corporations located at 52 Second Avenue, Waltham, MA 02451.
2. The KeySpan companies are gas companies, as defined in G.L. c. 164, § 1, and are regulated by the Department, pursuant to G.L. c. 164.
3. KeySpan is a member of the Distributed Generation Collaborative in D. T. E. 02-58 which has filed with the Department proposed uniform standards for interconnecting distributed generation and proposed tariffs relating to interconnection. One of the issues that the

¹ The Massachusetts local distribution companies that do business as KeySpan Energy Delivery New England are Boston Gas Company, Colonial Gas Company and Essex Gas Company.

Department has indicated that it will review in the next phase of the collaborative process is standby rates.

4. The Department's review of the standby rates in this NStar proceeding is directly related to rate issues for distributed generation and would substantially and specifically affect KeySpan's interests because the Company provides natural gas service to a number of NStar customers who have distributed generation facilities.

5. KeySpan's limited participant status will not jeopardize the Department's review and can assist in addressing the issues outlined in the Department's notice.

6. KeySpan's interests are unique and cannot be adequately represented by any other party.

7. Accordingly, KeySpan seeks to take part as a limited participant in this case and where appropriate to file comments, attend and participate in technical conferences, submit briefs, and to participate in this proceeding in any other manner deemed appropriate for limited participants by the Hearing Officer.

Wherefore, KeySpan respectfully requests that the Department grant this Petition for Limited Participant Status.

Respectfully submitted,

Patricia Crowe, Counsel
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Dated: February 3, 2004